



# Oregon

Theodore R. Kulongoski, Governor

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September 28, 2010

Dear Mr. Cora,

Thank you for the opportunity to comment on the Draft Final Baseline Human Health Risk Assessment for the Harbor Oil Superfund Site. After reviewing the document, the Office of Environmental Public Health (OEPH) does have a few comments.

As you know, fish are a healthy source of dietary protein and omega-3 fatty acids. Fish from Force Lake (and the Columbia Slough in general) are likely an important and inexpensive source of food for people with limited financial resources in the area. The goal of OEPH's fish advisory program is to encourage people to consume as much fish as is safe, depending on the levels of bioaccumulative toxins measured in those fish. The Force Lake fish advisory issued by this office (cited in section 3.3.3.2 on page 66 of HHRA) was intended as a stop-gap measure until fish tissue could be collected and analyzed. The HHRA uses BSAFs to calculate fish tissue concentrations, and this likely overestimates the risk from fish consumption. OEPH is concerned that, without measured fish tissue data, the general fish advisory for Force Lake may unnecessarily discourage use of a source of food for people who really need it. Therefore, we request that the current advisory be acknowledged as -- "a stop-gap measure pending measured fish tissue data provided by the Responsible Parties" -- in that paragraph on page 66 of the HHRA.

We also recommend that EPA collect fish tissue from Force Lake for analysis of contaminants of concern for the site (PCBs and DDT at a minimum). One or two composites of five fish from Force Lake (10-13 inches in length) would be adequate to evaluate any contamination in the fish for the purposes of human health risk assessment and updating the current advisory. Larger fish would also be acceptable if the largest fish is less than 25% larger than the smallest. Carp should be the target fish for sampling since it was found to be the most contaminated species in the Columbia Slough, and is representative of both bottom feeders and fish that feed in the water column. Whole fish should be analyzed, since not all human consumers eat only fish fillets.

Next, OEPH recommends that EPA take a "bigger picture" view of the potential public health risks, particularly for people who rely on fish from Force Lake, even in part, as a food source. We think it would be appropriate to acknowledge in the HHRA that these are likely people who also eat fish from other urban water bodies in the area that are not be pristine (such as the Columbia Slough). We request that EPA describe the low intake rate used in the HHRA in this context. The amount of fish consumed from Force Lake by anglers and their families may only represent a portion of their overall fish intake from contaminated water bodies.

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Finally, it should be explicitly stated in the Exposure Assessment section that consumption of the entire body of the fish was assumed. This is a conservative, and appropriate, assumption, especially for carp.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Farrer".

David G. Farrer, Ph.D.  
Toxicologist